

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

CRYSTAL BOLDUC,

Plaintiff,

vs.

AMAZON.COM INC.,

Defendant.

Civil Action No. 4:22-cv-615-ALM

**AGREED JOINT MOTION REGARDING ANSWER OR RESPONSE
DEADLINE AND EXTENDED BRIEFING SCHEDULE**

COMES NOW, Plaintiff Crystal Bolduc (“Bolduc”) and Defendant Amazon.com, Inc. (“Amazon”)¹ and file this Agreed Joint Motion Regarding Answer or Response Deadline and Extended Briefing Schedule and in support would respectfully show the Court as follows:

- Plaintiff filed her Second Amended Complaint on February 21, 2023. After conferring, the Defendant indicated its intent to file a renewed Motion to Dismiss and the Parties have agreed that Defendant’s deadline to file that responsive motion or otherwise answer or respond should be March 24, 2023² (which was Defendant’s previous deadline to file its reply brief regarding Defendant’s original Motion to Dismiss before the new complaint was filed).
- The Parties likewise agree that Plaintiff’s deadline to respond to any responsive motion filed by Defendant should be April 24, 2023.

¹ Defendant files this Motion without prejudice to and with express reservation of all rights to contest jurisdiction in this matter.

² Defendant’s current deadline to file a response or answer to the Second Amended Complaint is March 7, 2023. This requested extension would be an extension of 16 days beyond the 14 days provided under the rules for responding to amended complaints.

- The Parties have further agreed that the deadline for Defendant's reply brief to its responsive motion should be May 8, 2023.
- These agreed deadline extensions are reasonable and for good cause in light of the Parties' good faith conferrals and continued attempts to narrow the issues for the Court.

In light of the foregoing, the Parties jointly and respectfully request, pursuant to Federal Rule of Civil Procedure 6.1(b)(1), that the Court grant this Motion and extend Defendant's Answer or response deadline to March 24, 2023, Plaintiff's deadline to respond to any responsive motion by Defendant to April 24, 2023, and Defendant's reply brief deadline to any such responsive motion to May 8, 2023.

Dated: March 1, 2023

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure and this Court's CM/ECF filing system on March 1, 2023.

/s/ Angela C. Zambrano
Angela C. Zambrano